



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 16, 2020

BY ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Theofrastos Lymberatos, 19 Cr. 651 (LTS)*

Dear Judge Swain:

The Government respectfully requests that the attached proposed supplemental protective order, which has been executed by newly retained counsel for defendant Theofrastos Lymberatos, be entered in the above-captioned matter.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: *Robert B. Sobelman*
Elizabeth A. Hanft
Daniel M. Loss
Samuel P. Rothschild
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-2334/6527/2504/2616

Attachment

cc: Jeffrey Einhorn, Esq. (by ECF)
 Jeffrey Lichtman, Esq. (by ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	<u>SUPPLEMENTAL</u>
UNITED STATES OF AMERICA	:	<u>PROTECTIVE ORDER</u>
	:	
- v. -	:	
	:	19 Cr. 651 (LTS)
THEOFRASTOS LYMBERATOS,	:	
	:	
Defendant.	:	
	:	
- - - - -	x	

WHEREAS, on January 31, 2020, the Court entered a Protective Order, which was executed on behalf of the defendant by David Bertan, Esq. (Dkt. No. 157);

WHEREAS, on March 12, 2020, Jeffrey Lichtman, Esq., and Jeffrey Einhorn, Esq., filed notices of their appearance in this case as retained counsel for the defendant (Dkt. Nos. 198, 199);

IT IS HEREBY agreed, by and between the United States of America, Geoffrey S. Berman, United States Attorney, by Elizabeth A. Hanft, Daniel M. Loss, Samuel P. Rothschild, and Robert B. Sobelman, Assistant United States Attorneys, of counsel, and Mr. Lichtman and Mr. Einhorn, counsel for the defendant, that Mr. Lichtman and Mr. Einhorn are and shall be bound by the terms of the Protective Order, which is incorporated by reference herein, as if they were original signatories thereto.

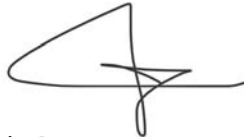
Dated: New York, New York
March 16, 2020

SO ORDERED:

/s/Laura Taylor Swain
THE HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

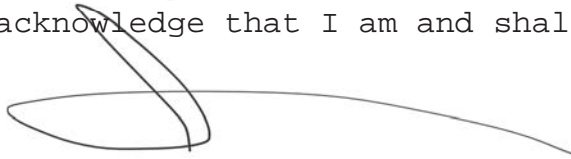
Acknowledgement of Protective Order

I, Jeffrey Lichtman, Esq., have read and reviewed the Protective Order entered on January 31, 2020, in the case of *United States v. Theofrastos Lymberatos*, 19 Cr. 651 (LTS), I understand it, and I acknowledge that I am and shall be bound by the Order.



Jeffrey Lichtman, Esq.
Attorney for Theofrastos Lymberatos

I, Jeffrey Einhorn, Esq., have read and reviewed the Protective Order entered on January 31, 2020, in the case of *United States v. Theofrastos Lymberatos*, 19 Cr. 651 (LTS), I understand it, and I acknowledge that I am and shall be bound by the Order.



Jeffrey Einhorn, Esq.
Attorney for Theofrastos Lymberatos